

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

SANDRA L. EDDY,

Plaintiff,

vs.

BELLEVUE BERRY FARMS, INC.,  
EDWARD A. SCHAEFER A TRUSTEE  
LIVING TRUST, and DOES 1-5,

Defendants.

**8:18CV221**

**PROTECTIVE ORDER**

This matter comes before this Court at the request of the parties in this action.

WHEREAS, Plaintiff is seeking discovery of financial information from the Defendants.

WHEREAS, Defendants contend that such information is confidential and should not be shared outside of this litigation.

WHEREAS, the parties have approved this Order as shown by the signatures indicating approval of the contents of this Order.

**IT IS THEREFORE ORDERED AS FOLLOWS:**

1. The parties agree that any exhibits produced at the Rule 36(b) deposition of a representative of Defendant shall be marked as confidential. Such exhibits will include financial records of any nature representing the financial condition of Defendant and its shareholders and officers. That testimony taken during this deposition will be designated as confidential.
2. Such records will be placed under restricted access with the Court for any pretrial proceedings. These records can be used at trial and disclosed to the jury, if otherwise admissible.
3. The parties shall be allowed to share such information with any expert witnesses consulted or retained by the parties. The parties shall advise the expert witness of this Order and that such information is to remain confidential.
4. The Parties shall not disclose the information described above to any persons or entities who are not involved in this litigation.

5. Within 30 days of final resolution of this matter (whether by settlement or trial, including any appeals) the parties shall destroy the exhibits.

Dated this 1<sup>st</sup> day of June, 2020.

BY THE COURT:

s/Michael D. Nelson  
United States Magistrate Judge

APPROVED AS TO CONTENT AND FORM:

BY: /s/Raymond R. Aranza, #18523

Raymond R. Aranza, #18523  
Richard C. Gordon, #11549  
Jonathan M. Brown, #25021  
WALENTINE O'TOOLE, LLP  
11240 Davenport Street  
P. O. Box 540125  
Omaha, NE 68154

Phone: (402) 330-6300 Fax: (402) 330-6303  
Email: [taranza@walentineotoole.com](mailto:taranza@walentineotoole.com)  
[dgordon@walentineotoole.com](mailto:dgordon@walentineotoole.com)  
[jbrown@walentineotoole.com](mailto:jbrown@walentineotoole.com)

ATTORNEYS FOR BELLEVUE BERRY FARMS,  
INC.; EDWARD A. SCHAEFFER A TRUSTEE  
LIVING TRUST, Defendants

BY: /s/Justin High, #23354

Justin High, #23354  
High & Younes  
6919 Dodge Street  
Omaha, Nebraska 68132  
Ph: 402-933-3345  
Fax: 402-933-3020  
[justin@hyattorneys.com](mailto:justin@hyattorneys.com)

Ross Pesak  
Pesak Law  
4826 S. 24<sup>th</sup> Street  
Omaha, NE 68107  
Phone: 402-342-9684  
Fax: 402-342-9683  
[ross@pesaklaw.com](mailto:ross@pesaklaw.com)  
ATTORNEYS FOR SANDY L. EDDY,  
PLAINTIFF